

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Copy 15

JOHN RICHARD JAE,  
Plaintiff,

vs.

KENNETH D. KYLER, et al.,  
Defendants.

JUDGE'S COPY

FILED  
HARRISBURG

SEP 07 2001

MARY E. D'ANDREA, CLERK

Per AS  
DEPUTY CLERK

CRIM No. 1:00-cv-00315

U.S. District Judge Ramba

Magistrate Judge Smyser

MOTION FOR ENLARGEMENT OF TIME

Comes now, the Plaintiff & his Counsel in the above entitled Civil Action, Richard Jae, as a Layman Unlettered in the Arts & Sciences of the Laws & Legal Procedures within the United States, & files his Motion For Enlargement of Time pursuant to Fed. R. Civ. P. 6(b), herein, & who, avers, deposes & states:

1. Due to the Facts that this Plaintiff has a pending Motion to Compel Discovery before U.S. Magistrate Judge Smyser, of this court, herein this case, that Plaintiff is simultaneously filing along with this here Motion his Reply to Defendants' Brief in Opposition to Plaintiff's Motion to Compel & that he is also filing his Appeal from U.S. Magistrate Judge Smyser's order of August 14, 2001, to the U.S. District Judge, herein this case, & this Court needs time to rule on Plaintiff's Motion to Compel Discovery and Plaintiff's Appeal from the U.S. Magistrate Judge's order of August 14, 2001, herein, and such decision(s) may effect the plaintiff's response to the defendants' motion for summary judgment, this plaintiff is unable to file & serve his brief in opposition to the defendants' motion for summary judgment & his supporting documents, by the present due date for such of September 4, 2001, & given the above, this court should grant him an enlargement of time of thirty (30) days to & including October 4, 2001, in which to & serve his brief and supporting documents in opposition to defendants' motion for summary judgment, herein this case.

(w) HEREOF, this court should grant the plaintiff an enlargement of time to & including October 4, 2001, in which to file such brief & supporting documents herein:

(c) John Richard Jae  
MR. JOHN RICHARD JAE

#BQ-3014  
OCT - GREENE ENV  
125 Progress Drive  
Waynesburg, PA 15390-8084

Dated: 30th AUGUST 2001

JOE V. KYLER, et al.  
 CRF/No. 1-CR-00-0315  
CERTIFICATE OF SERVICE

I certify that on ~~8/31/01~~ 8/31/01, I mailed to the person / listed below a true & correct carbon copy of ~~each of the~~ within Plaintiff's Appeal U.S. District Judge from the U.S. Magistrate Judge's August 14, 2001 Order, Denying the Plaintiff's Motion for an Order Requiring Defendant DOE and SOI-Greene Superintendent Conner Blaine to Permit this Plaintiff to Communicate with and write to Inmate Norman Johnston at Camp Hill RHU, Motion for Order of Court Requiring SOI-Greene Prison Officials to Return to this Plaintiff ALL HIS Legal Materials, Court Cases and Law Books and to provide him with enough Paper, Carbon Paper, Envelopes to enable him to meet Court Deadlines, Enter Affirmation of Mandamus and Motion for Sanctions on Defendants & Counsel Hold Affiant Sharon Sebek in Contempt and Impose a Fine. Reply to Defendants' Brief in Opposition to Plaintiff's Motion to Compel and Motion for Enforcement of U.S. 1st Class Mail, Postage Prepaid and addressed to:

MR. Michael L. Harley, SDAG  
 Office of the Attorney General of Pennsylvania  
 15th Floor - Strawberry Square  
 Harrisburg, PA 17120

I certify that on ~~8/31/01~~ 8/31/01, I gave to Prison Officials hereafter, to this Court, the originals of the above same documents in this case.

I certify that the above is true & correct under penalty of perjury, pursuant to: 18 Pa.-C.S. § 4904 and 28 U.S.C. § 1746:

Dated/Executed on =  
 31st AUGUST 2001 =  
 At Albionburg, Pennsylvania =

(S) John Richard Jr  
 MR. JOHN RICHARD  
 400-3219  
 SOI-Greene/SMU  
 175 Progress Drive  
 Wayneburg, PA 15370

FBM The Desk Of:  
 MR. John Richard Doe,  
 #BQ-2214  
 SGT-Greene/SMU  
 175 Progress Drive  
 Waynesburg, PA 15370-8889  
 August 20, 2001

To: The Office of the Clerk,  
 U.S. District Court  
 228 Walnut Street  
 P.O. Box 983  
 Harrisburg, PA 17108-0983

Re: Doyle, Kyle et al.  
Civil No. 1:00-CV-00315

Dear Clerk:

Please File the Enclosed Plaintiff's Appeal to The U.S. District  
 Court from The U.S. Magistrate Judge's August 14, 2001, Order Denying The Plaintiff's  
 Motion For An Order Requiring Defendant Dragovich And SGT-Greene  
 Superintendent Canner Blame to Permit ~~the~~ This Plaintiff to ~~the~~ Commu-  
 nity And Write To Inmate Norman Johnston At SGT-Camp Hill RHY, IN  
 Order of Court Requiring SGT-Greene Prison Officials to Return to  
 Plaintiff ALL HIS Legal Materials Court Case Files And Law Books for  
 Provide Him with Enough Paper, Carbon Paper And Envelopes to Enable Him  
 Meet Court Deadlines, Inter Alia Petition For Writ of Mandamus And  
 For Sanctions on Defendants & Counsel And to Hold Affiant Sharon Se  
 Contempt And Impose A Fine, herein the above-entitled Civil Rights

Please also File the Enclosed Plaintiff's Reply to Defendant's  
 Brief in Opposition to Plaintiff's Motion to Compel and Not  
 Enlargement of Time, herein the above-entitled Civil Rights

Sincerely,

(S) John Richard Doe  
 MR. JOHN RICHARD DOE  
 Plaintiff and Rose Counsel

CC: MR. Michael L. Harey, SDAG  
 w/enc.

RECEIVED

SEP 07 2001

PER  
 HARRISBURG, PA. DEPUTY CLERK